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Attorneys for Mark D. Waldron, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit

Chapter 7

**DECLARATION OF PAMELA M.
EGAN IN SUPPORT OF
CHAPTER 7 TRUSTEE'S
MOTION FOR SANCTIONS
AGAINST JUN DAM FOR
UNAUTHORIZED PRACTICE OF
LAW AND VEXATIOUS
LITIGATION**

Pamela M. Egan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration.

2. I am a partner in the Potomac Law Group PLLC which is the court-appointed bankruptcy counsel for Mr. Waldron in his capacity as the Chapter 7 Trustee.

Declaration of Pamela M. Egan
in Support of Chapter 7 Trustee's Motion for
Sanctions Against Jun Dam for Unauthorized
Practice of Law and Vexatious Litigation

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1 3. I submit this declaration in support of the *Chapter 7 Trustee's Motion*
2 *for Sanctions Against Jun Dam for Unauthorized Practice of Law and Vexatious*
3 *Litigation*, filed herewith.

4 4. The statements made herein are based on my communications with
5 seven WTT token holders who confirmed that Mr. Dam had contacted them
6 regarding the Omnibus Objections.

7 5. Exhibit A to the Motion is a true and correct copy of an email that a
8 WTT Token holder forwarded to me. This WTT Token holder stated that Mr.
9 Dam had sent it to him. Another WTT Token holder sent me the content of the
10 same email, Exhibit A, without forwarding the entire email, but confirming that it
11 was sent by Mr. Dam.

12 6. The WTT Token holders with whom I communicated also confirmed
13 that Mr. Dam held a call to discuss the issues raised in Mr. Dam's email, Exhibit
14 A.

15 7. Exhibit B to the Motion is a true and correct copy of another email
16 that a WTT Token holder received from Mr. Dam and forwarded to me. This
17 WTT Token holders' identifying information is redacted. If Mr. Dam contests that
18 he sent this email, the sender's identify can be provided to the Court.

19 8. Exhibit B included a link to the "joinder" that Mr. Dam was
20 encouraging WTT Token holders to file. I clicked on the link and retrieved the
21
22

23 Declaration of Pamela M. Egan
24 in Support of Chapter 7 Trustee's Motion for
Sanctions Against Jun Dam for Unauthorized
Practice of Law and Vexatious Litigation

1 joinder. It is included with Exhibit B. Mr. Lignos' response to the Omnibus
2 Objection was attached to the email and is included with Exhibit B.

3 9. As of 6:30 p.m., November 8, 2024, I have spent (a) 18.8 hours
4 tracking and reviewing the responses and joinders relating to the Omnibus
5 Objections, which at the Court approved hourly rate of \$400 per hour is \$7,520 in
6 fees and (b) 18.4 hours preparing these sanctions papers, which at the rate of \$400
7 per hour is \$7,360 for a total of \$14,880 and accruing.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on this 9th day of November 2024 in Seattle, Washington.

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11 /s/ Pamela M. Egan

12 Pamela M. Egan
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23 Declaration of Pamela M. Egan
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